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September 7, 2023

VIA ECF

The Honorable Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Jason Jorjani v. New Jersey Institute of Technology, et al.
Civil Action Nos. 2:18-cv-11693 (WJM-JSA)

Dear Judge Allen:

This office represents the New Jersey Institute of Technology (“NJIT”) and the individual Defendants in this matter. We write pursuant to ¶ 10 of Your Honor’s August 1, 2023 Order, DE 156 requiring a joint letter as to the status of discovery and any unresolved disputes. While we recognize the Order required a joint letter, we received no communication from Plaintiff’s counsel in furtherance of satisfying this requirement. Furthermore, as of the date of this filing, counsel for Plaintiff has not brought any further discovery disputes to Defendants’ attention. We did send a draft of this letter to Plaintiff’s counsel but have received no response. Accordingly, we submit this letter on behalf of Defendants.

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As always, we are available at the Court's convenience.

Respectfully submitted,

/s/ Marc D. Haefner

Marc D. Haefner

cc: All Counsel of Record (via ECF)